

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JONATHAN R. MILLER, ESQ.,

Plaintiff,

v.

BREM MOLDOVSKY, ESQ., *et al.*,

Defendants.

Case No. 2:21-cv-02219-ER

**PLAINTIFF'S NOTICE OF ERRATA
RE: ECF #82**

Plaintiff Jonathan R. Miller, Esq., *pro se*, respectfully submits this Notice of Errata in order to correct an inadvertent typo in the memorandum of law (ECF #82) filed in opposition to the Moldovsky defendants' motion to compel.

Corrected, the first full sentence on page 20 of the memorandum of law should read:

Because Mr. Miller has not alleged anything but garden variety stress, and because he does **not** intend to present expert medical or psychological testimony, he has not placed his medical or psychological condition in issue and has not waived privilege.

Cf. ECF #82 at 20.

This correction is consistent with Plaintiff's actual interrogatory response: "Plaintiff does not presently intend to submit expert testimony." *See id.* at 18.

The Special Master and all parties were notified of this correction on February 11, 2022; this Notice is being filed to correct the public record.

Respectfully submitted,

Date: February 14, 2022

/s/ Jonathan R. Miller, Esq.

Plaintiff pro se

(PA #201210)

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February 11, 2022

VIA EMAIL & JAMS SUBMISSION

The Hon. Thomas J. Rueter, U.S.M.J. (Ret.)
c/o JAMS
1717 Arch Street, Suite 3810
Philadelphia, PA 19103

Re: Miller v. Moldovsky et al., No. 21-cv-02219 (E.D. Pa.) — JAMS #1450007989

Dear Judge Rueter:

A few minutes ago I filed and served my opposition to Mr. Moldovsky's motion to compel. (ECF #82.) There is a typo in the first full sentence on page 20 of the brief. That sentence should read:

Because Mr. Miller has not alleged anything but garden variety stress, and because he does **not** intend to present expert medical or psychological testimony, he has not placed his medical or psychological condition in issue and has not waived privilege.

Cf. ECF #82 at 20.

This correction is consistent with Plaintiff's actual interrogatory response, appearing on page 18 of the same brief: "Plaintiff does not presently intend to submit expert testimony."

I hope that clears up any possible confusion. I can file this letter on the court docket if so instructed.

Respectfully,



Jonathan R. Miller

cc: All counsel of record